

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>Legacy IMDBS, Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p> <p>Synacor, Inc.,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,</p> <p style="text-align: center;">Defendants.</p>	<p>Chapter 11</p> <p>Case No. 23-10852 (KBO)</p> <p>Jointly Administered</p> <p>Adversary Proceeding No. 23-50753 (KBO)</p>
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**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER
APPROVING STIPULATION FOR FURTHER EXTENSION OF TIME TO
RESPOND TO COMPLAINT FOR DECLARATORY JUDGMENT**

The undersigned counsel to Defendants IV Media, LLC and Innovation Ventures, LLC (together, the “Defendants”) in the above-captioned adversary proceeding hereby certifies that:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

1. On November 1, 2023, Plaintiff Synacor, Inc. (“Plaintiff”) filed its *Complaint for Declaratory Judgment* [Adv. Docket No. 1] (the “Complaint”) initiating this adversary proceeding.

2. On December 6, 2023, Plaintiff and Defendants entered into a *Stipulation for Extension of Time to Respond to Complaint for Declaratory Judgment*, which is filed at Adv. Docket No. 8, and extended the time for Defendants to respond to the Complaint through and including January 4, 2024.

3. As a result of settlement discussions between the parties, Plaintiff and Defendants have agreed to a further extension of Defendants’ time to respond to the Complaint through and including January 11, 2024, as memorialized in *Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment* (the “Stipulation”), a copy of which is attached as Exhibit 1 to the proposed order attached hereto.

4. Pursuant to Del. Bankr. L.R. 7012-2, the parties seek entry of an order approving the Stipulation.

5. Defendants therefore request that the Court enter the proposed order attached hereto as Exhibit A at its earliest convenience. Counsel is available at the request of the Court.

Dated: January 4, 2024
Wilmington, Delaware

Respectfully submitted,

GREENBERG TRAURIG, LLP

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